



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW
DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

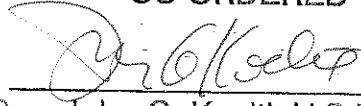
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March 17, 2023

BY ECF

Judge John Koeltl
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

APPLICATION GRANTED
SO ORDERED

3/17/23 
John G. Koeltl, U.S.D.J.

Re: *Perez v. City of New York, et al.*,
21 Civ.07883 (JGK)
Our No. 2021-034366

Dear Judge Koeltl:

I am a Special Assistant Corporation Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendants the City of New York, Captain Julio Ordonez (sued here as Inspector Julio Ordonoz), and Lieutenant Joaquin Disla (the "City Defendants") in the above-referenced action. I write, on behalf of all parties, to respectfully request a stay of discovery, except as specified below, and all other deadlines pending conclusion of mediation.

Our office recently reached out to the Mediation Program of the Southern District of New York, as this is an employment discrimination matter, and it was not referred to mediation. The office stated that they would be sending this matter to mediation shortly. The current end date for fact discovery is Tuesday, March 21, 2023. See ECF Doc. No. 32. The parties propose to submit a draft revised Scheduling Order in the event that mediation is unsuccessful.

To date, the City Defendants have served document requests and interrogatories. Plaintiff has served document requests and responses to the City Defendants' demand for interrogatories, but not to the City's document demands. The City Defendants are preparing a

confidentiality stipulation and proposed protective order for review by the other parties and submission to the Court. The City Defendants will promptly serve responses to Plaintiff's document requests after entry of the protective order.

Accordingly, we respectfully request that Your Honor grant this request for a stay of discovery (following entry of a protective order) pending completion of mediation.

Thank you, in advance, for your consideration of this request.

Respectfully Submitted,
s/Noah Potter
Special Assistant Corporation
Counsel

cc: Counsel of Record (via ECF)